

EXHIBIT A

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

ABDUL NEVAREZ, PRISCILLA NEVAREZ, and
SEBASTIAN DEFRENCESCO, on behalf of
themselves and all others similarly situated.

Plaintiffs,

VS.

FORTY NINERS FOOTBALL COMPANY, LLC,
a Delaware limited liability company, et al.,

Defendants.

Case No.: 5:16-cv-07013-LHK

**PLAINTIFF ABDUL NEVAREZ'S
INTERROGATORIES PROPOUNDED ON
FORTY NINERS FOOTBALL COMPANY
LLC, FORTY NINERS SC STADIUM
COMPANY LLC & FORTY NINERS
STADIUM MANAGEMENT COMPANY
LLC**

(SET ONE)

Before: Hon. Lucy H. Koh
Complaint Filed: December 7, 2016
Trial Date: April 22, 2019

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1 **PROPOUNDING PARTY:** Plaintiff Abdul Nevarez

2 **RESPONDING PARTY:** Defendants FORTY NINERS FOOTBALL COMPANY LLC;
3 FORTY NINERS SC STADIUM COMPANY LLC; FORTY NINERS
4 STADIUM MANAGEMENT COMPANY LLC

5 **SET NO.:** ONE (1)

6 Pursuant to Federal Rule of Civil Procedure 26, Plaintiff Abdul Nevarez propounds his first set
7 of interrogatories on Defendants FORTY NINERS FOOTBALL COMPANY LLC; FORTY NINERS
8 SC STADIUM COMPANY LLC; FORTY NINERS STADIUM MANAGEMENT COMPANY LLC
9 (“Defendants”). Under the provisions of Federal Rule of Civil Procedure 33, Defendants are required
10 to serve full and complete written responses within thirty (30) days of service hereof to Plaintiffs’
11 counsel of record. You are requested to set out each interrogatory prior to the answer directed to it.

12 For each interrogatory or part of each interrogatory which the Defendants refuse to answer on
13 the ground of privilege, state the specific nature of the privilege claimed with appropriate citation to
14 the relationship or information claimed to be privileged and the reason for this privilege.

15 These requests are continuing in nature and require supplemental responses as provided by
16 Rule 26 of the Federal Rules of Civil Procedure.

17 In answering these interrogatories, furnish all information as it is available to you, including
18 information in the possession of your attorneys, investigators, employees, agents and representatives,
19 and not merely information of your own personal knowledge.

20 If you cannot answer the following interrogatories in full after exercising due diligence, answer
21 the remainder and state whatever information or knowledge you have concerning the unanswered
22 portion.

23 If any interrogatory calls for a description of a document, photograph, or other writing or thing,
24 describe it in detail sufficient to satisfy the requirements for issuance of a subpoena, or in lieu thereof,
25 attach a copy of such document to your answers to interrogatories.

26 DEFINITIONS

27 1. “ADDRESS” means the street address, including the city, state, and zip code.

28 2. “DEFENDANT” shall mean and refer to the defendants FORTY NINERS FOOTBALL
COMPANY LLC, FORTY NINERS SC STADIUM COMPANY LLC, FORTY NINERS STADIUM

MANAGEMENT COMPANY LLC, or any subsidiary, division, related company, officer, director, partner, employee, agent, board of directors, board member, and representative of those entities.

3. The singular shall include the plural and vice versa; the terms “and” and “or” shall be both conjunctive and disjunctive; the term “including” means “including without limitation.”

4. If any request is defined using a term of art or other terms that you believe to be incorrect, but you understand the nature of the information requested, you should respond notwithstanding the semantic or definitional error or ambiguity.

INTERROGATORIES

INTERROGATORY NO. 1:

Identify by name, ADDRESS, telephone number, and email address all persons who purchased accessible seating tickets from DEFENDANTS for any event held at Levi's Stadium on or after July 17, 2014. This interrogatory seeks only information within the possession, custody, and/or control of DEFENDANT.

INTERROGATORY NO. 2:

Identify by name, ADDRESS, telephone number, and email address all persons who purchased accessible parking passes from DEFENDANTS for any event held at Levi's Stadium on or after July 17, 2014. This interrogatory seeks only information within the possession, custody, and/or control of DEFENDANT.

Dated: October 6, 2017

Respectfully submitted,

GOLDSTEIN, BORGEN, DARDARIAN & HO

Andrew P. Lee
Attorneys for Plaintiffs and the Proposed Classes